

308 Building/2A
October 22, 2002



Document Processing Desk - 6(a)(2)
Office of Pesticide Programs - 7504C
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: FIFRA § 6(a)(2) Report
Vikane* Gas Fumigant
EPA Registration Number: 62719-4
Active Ingredient: Sulfuryl Fluoride
CAS Registry Number: 002699-79-8
DERBI Number: 105503
State: FL
Severity Category: H-A

Dow AgroSciences submits the following information in response to its understanding of the U.S. Environmental Protection Agency's interpretation of FIFRA § 6(a)(2). However, Dow AgroSciences has not concluded that this information regards an "unreasonable adverse effect on the environment" or that it is reportable under FIFRA § 6(a)(2).

Dow AgroSciences received the enclosed information regarding an alleged human death.

It is important to note that the Vikane Gas Fumigant label requires the introduction of chloropicrin to the structure prior to fumigation at a rate of one ounce per 10,000-15,000 feet (17-25 ppm) to serve as a warning agent. This warning agent causes smarting of eyes, tearing, throat and nose irritation, and a disagreeable pungent odor at very low concentrations (ca. 0.3 ppm).

The Vikane Gas Fumigant label states the following: "When fumigating, observe local, state and federal rules and regulations including such things as use of chloropicrin, clearing devices, positive-pressure self contained breathing apparatus, security requirements, and placement of warning signs:... Extremely Hazardous Liquid and Vapor Under Pressure, Inhalation of Vapors may be Fatal." Under the "Preparation for Fumigation" section of the label, the use directions for structural fumigation state "Remove from the structure to be fumigated all persons, domestic animals, pets - including fish and desirable growing plants." Also, under the Aeration and Reentry section of the label, use directions state "... treated area must be aerated until the level of sulfuryl fluoride is 5 ppm or less, as measured by a detection device with sufficient sensitivity such as an INTERSCAN or MIRAN gas analyzer." Within this section of the label it further states "Do not reoccupy fumigation site, i.e. building, ship, vehicle or chamber, nor move vehicle until aeration is complete."

If you wish to discuss this matter further, please call us.

Regards,

A handwritten signature in cursive script that reads "Shannon Bass".

Shannon Bass
EH&S Global Product Leader
(317) 337-4983

Prepared by:

A handwritten signature in cursive script that reads "Stacey Friis".

Stacey Friis
Product Stewardship Administrator
(317) 337-4577

*Trademark of Dow AgroSciences

EPH
11/1/02



FIFRA § 6(a)(2) Global Adverse Effects Reporting Form

FIFRA § 6(a)(2) does not require investigation of alleged incidents. Please complete this form, to the best of your ability, with the knowledge you have on any incident without further investigation. However, if you receive additional information it is your responsibility to submit a supplemental report.

Send completed forms to:

e-mail: aerc@dow.com

Questions: Global AERC Administrator
(317) 337-4577

mail: Dow AgroSciences
9330 Zionsville Road
Indianapolis, IN 46268
Attention: AERC-308 Building

Administrative Information

Your Name:	Eric Hobelmann		
Date you became aware of the Incident:	(month/day/year)	11-October-02	

Reporter (person reporting incident to you):

Last Name:	[REDACTED]	First Name:	[REDACTED]
Street Address:	[REDACTED]		
City:	St. Petersburg	State/Country:	Florida, USA
Telephone Number:	[REDACTED]		33707

Contact Person (if different from the Reporter)

Last Name:	NA	First Name:	NA
Street Address:	NA		
City:	NA	State/Country:	NA
Telephone Number:	NA		Zip Code: NA

Product Information

Product(s) involved:	Sulfuryl Fluoride		
U.S. EPA Registration Number:	62719-4		
Exposed to concentrate prior to dilution:	No		

DERBI: 105503
Report: Yes ☒ No ☐
If no, Why: SC
Date: 10/11/02
21

Exposure Information

Date of Exposure: Allegedly 10-Oct and/or 11-Oct

Geographical location of exposure: [REDACTED]

How exposed? ☐ ☐ ☐ Inhalation ☐ ☐ _____

Brief description of alleged incident:

Professional Termite & PC was performing a fumigation job of frame crawl house & detached frame slab garage apartment ~ 18 cfm at the above address. During the concluding part for the 1-hour active aeration period, in the garage apartment, the fumigator found a female body lying in the bathtub with a facecloth over her face of the 2nd floor bathroom. The Pest Control company called authorities. Police arrived @ 2:49PM according to a newspaper article.

Application CircumstancesEvidence label directions were not followed: No

Application was made by: Irvin Carpenter

Pest Control Operator ☐ SPID Cardholder

Circumstances regarding application:

Information about application can be obtained from the Department of Agriculture & Consumer Services report. There are no case #'s assigned, filed by company name.

There is also a new department of DACS (Bureau of Investigative Services- Law Enforcement Investigator Glenn Kramer) working on this case. A case # will be available thru his department on Monday 14-Oct-02.

Statements made to me by the applicator indicated he had personally been thru the garage apartment 3 times prior to application. This included a proper final walk-thru that he also had a fellow employee with him. That fellow employee used the toilet approximately 1-3 feet away from where the body would later be found. The applicator stated he is certain the victim was not in the tub at that time.

Type of incident: ☐ Human

Alleged Human ExposureClarify how many people are involved with the alleged exposure: OneAge, if known, adult or child: ☐ AdultGender: ☐ Female If female, is she pregnant? ☐ UnknownOccupation (if related to use of product): UnknownWas protective clothing worn: ☐ UnknownHow many workdays were lost due to illness: UnknownRoute of exposure: ☐ InhalationWas alleged adverse effect a result of: ☐ Suicide/Homicide* *(SEE NOTES- below)Time between exposure and onset of symptoms: (hr/day/min) UnknownSymptoms experienced: UnknownType of medical care sought: UnknownLaboratory test results: (attach copy if available) Unknown**Explanatory or qualifying information surrounding the incident:**

The victim was identified as [REDACTED]. An unidentified neighbor told [REDACTED] informed her she would be in Orlando during the fumigation & gave her a phone # of where she would be. She then gave this info. to Gulfport Police.

Also of note, Detective Ron Howeth stated in a newspaper article that a 2 page handwritten note, a spiral notebook & business cards were left neatly on her bed. "Sorry to put such a burden on you" Howeth said the note read.

St. Petersburg Times newspaper article dated 12-Oct-02 states that Gulfport detectives said she committed suicide by hiding or slipping back into the house full of poison gas.

[REDACTED] stated to me that officers told him this was not being conducted as a criminal investigation.

Personal privacy